

5. Complete diversity of citizenship existed between the parties at the time the Complaint was filed, and it continues to exist as of the date of this Notice of Removal.

6. The Pennsylvania Rules of Civil Procedure do not permit litigants to demand a sum certain as damages. Pa. R. Civ. Pro. 1021(b). “In counties having rules governing compulsory arbitration,” however, “the plaintiff shall state whether the amount claimed does or does not exceed the jurisdictional amount requiring arbitration referral by local rule.” Pa. R. Civ. Pro. 1021(c). The Bucks County Local Rules of Civil Procedure provide for compulsory arbitration on all cases where the amount in controversy is less than \$50,000.00. Bucks County L. R. Civ. Pro. 1301(a). Plaintiff in this action has alleged that the amount in controversy is in excess of \$50,000.00 and that this case was therefore not subject to compulsory arbitration in the Bucks County Court of Common Pleas. Plaintiff has further alleged in support of his claim for defamation that he “suffered typical general damages, such as injury to reputation, impairment of standing in the community, personal humiliation and mental anguish.” Plaintiff seeks both compensatory and punitive damages. Plaintiff alleges identical harms and demands identical damages with respect to his claim for invasion of privacy. Considering the nature of Plaintiff’s claims, his indication that the amount in controversy exceeds the compulsory arbitration threshold and his demand for both compensatory and punitive damages, the amount in controversy in this matter exceeds \$75,000.00.

7. This Court therefore has diversity jurisdiction under 28 U.S.C. § 1332, as the parties are citizens of different states and the amount in controversy exceeds \$75,000.00.

8. Removal is timely pursuant to 28 U.S.C. § 1446(b) because this Notice is filed within thirty (30) days after service of the Complaint.

9. Written notice of the filing of this Notice of Removal is being served on this date upon Plaintiff's counsel of record as required by 28 U.S.C. § 1446(d). *See* Exhibit "B."

10. A true and correct copy of this Notice of Removal is being filed on this date with the Clerk of the Court of Common Pleas for Bucks County, Pennsylvania as required by 28 U.S.C. § 1446(d).

11. Venue is proper for removal purposes only under 28 U.S.C. § 1441(a) because the Court of Common Pleas for Bucks County, Pennsylvania is located within the district of the United States District Court of the Eastern District of Pennsylvania.

12. For the foregoing reasons, MyLife.com has properly removed this action to the United States District Court for the Eastern District of Pennsylvania as provided by law.

Respectfully submitted by:

**KLEHR HARRISON HARVEY
BRANZBURG LLP**

Date: February 23, 2021

/s/ Jordan Rand

Jordan M. Rand (208671)
1835 Market Street, Suite 1400
Philadelphia, PA 19103
(215) 569-3024
jrand@klehr.com

CERTIFICATE OF SERVICE

I, Jordan Rand, Esquire, do hereby certify that a true and correct copy of Defendant's Notice of Removal was filed on the date set forth below and served upon the following counsel of record:

Andrew Cotlar, Esquire
COTLAR & COTLAR
23 West Court Street
Doylestown, PA 18901
Attorney for Plaintiff

**KLEHR HARRISON HARVEY
BRANZBURG LLP**

Date: February 23, 2021

/s/ Jordan Rand
Jordan M. Rand (208671)
1835 Market Street, Suite 1400
Philadelphia, PA 19103
(215) 569-3024
jrand@klehr.com

EXHIBIT A

LAW OFFICES
Cotlar & Cotlar

Steven A. Cotlar
Andrew D. Cotlar*
*Also admitted to D.C. Bar

23 West Court Street
Doylestown, Pa. 18901

215-345-7310
610-847-8900
Fax 215-348-4634

www.cotlarlaw.com

E-mail: andrewdcotlar@gmail.com

February 4, 2021

MyLife.com
1100 Glendon Avenue, Suite 720
Los Angeles, CA 90024

VIA CERTIFIED MAIL RETURN RECEIPT REQUESTED

RE: Mark Holbrow v. MyLife.com, Bucks County Court of Common Pleas, Docket
No. 2021-00634; Our File FF-138

Dear Sir or Madam:

This office represents Mark Holbrow in the above captioned matter. The enclosed complaint summarizes the essential facts, whereby your company has engaged in a scheme of extortion to defame my client's reputation online. You should refer this to your insurance carrier promptly.

Sincerely,



Andrew D. Cotlar
ADC: w/encl



COURT OF COMMON PLEAS OF BUCKS COUNTY, PENNSYLVANIA

MARK HOLBROW

vs.

MYLIFE.COM INC

NO. 2021-00634

CIVIL COVER SHEET

State Rule 205.5 requires this form be attached to any document commencing an action in the Bucks County Court of Common Pleas. The information provided herein is used solely as an aid in tracking cases in the court system. This form does not supplement or replace the filing and service of pleadings or other papers as required by law or rules of court.

Name of Plaintiff/Appellant's Attorney: Andrew Douglas Cotlar, Esq., ID: 204630

Self-Represented (Pro Se) Litigant ☐

Class Action Suit

☐

Yes

☒

No

MDJ Appeal

☐

Yes

☒

No

Money Damages Requested☒**Commencement of Action:**Complaint**Amount in Controversy:**More than \$50,000**Case Type and Code**

Tort: _____

Slander/Libel/Defamation

Other: _____

IN THE COURT OF COMMON PLEAS OF BUCKS COUNTY, PENNSYLVANIA
CIVIL ACTION - LAW

Mark Holbrow,

Plaintiff

VS.

MyLife.com, Inc.

Defendant

: NO. _____

:

:

:

: CIVIL ACTION - LAW

:


: JURY TRIAL DEMANDED

NOTICE TO DEFEND

You have been sued in court. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after this Complaint and Notice are served, by entering a written appearance personally or by attorney and filing in writing with the Court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the Court without further notice for any money claimed in the Complaint or for any other claim or relief requested by the Plaintiff. You may lose money or property or other rights important to you.

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER OR CANNOT AFFORD ONE, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW TO FIND OUT WHERE YOU CAN GET LEGAL HELP.

Bucks County Bar Association
135 East State Street
Doylestown, PA 18901
(215) 348-9413 or 1-800-273-2929


Andrew D. Cotlar
Attorney for Plaintiffs
23 W. Court Street
Doylestown, PA 18901
(215) 345-7310

Law Office of Cotlar & Cotlar
Andrew D. Cotlar, Esq. /Attorney I.D. #204630
23 West Court Street
Doylestown, PA 18901
(215)-345-7310

Attorney for Plaintiffs

IN THE COURT OF COMMON PLEAS
BUCKS COUNTY, PENNSYLVANIA

Mark Holbrow,

Plaintiff

VS.

MyLife.com, Inc.

Defendant

: NO. _____

:

:

:

: **CIVIL ACTION – LAW**

:

: **JURY TRIAL DEMANDED**

COMPLAINT

Plaintiff by and through his attorney, Andrew D. Cotlar, Esquire, files the within Complaint and in support thereof aver the following.

1. Plaintiff is an adult individual who resides at 3008 River Road, New Hope, Pennsylvania, 18938.
2. Plaintiff owns and operates the Bucks County Academy of Fencing, a sport fencing athletic facility that has for 40 years been providing lessons and competitive training to all ages, including young children. Plaintiff substantially relies upon his reputation for personal and business development.
3. Defendant, MyLife.com, Inc. is a privately-held Delaware corporation with approximately \$20 million in annual revenue with principal offices located at 1100 Glendon Avenue, Suite 720, Los Angeles, California, 90024.

4. Defendant sells consumer background reports through their website, www.mylife.com. This website allows users to run free background searches for an individual's name, and then displaying search results that imply, often falsely, that the subject of a search may have records of criminal or sexual offenses—records that can conveniently be viewed only by purchasing a MyLife subscription.
5. Defendant is presently and separately the subject of a complaint in federal court filed by the Federal Trade Commission (“FTC”) and U.S. Department of Justice (“DOJ”) for violations of the FTC “telemarketing sales rule,” the Restore Online Shopper’s Confidence Act, and the Fair Credit Reporting Act. United States of America v. MyLife.com, Inc. et. al., 2:20-cv-06692 (U.S. Dist. Ct. C.D. Ca.).
6. Defendant has also been sued numerous times for defamation by individuals who have discovered that when their name is inputted into Defendant’s website, the public results falsely indicate that the individual has a criminal record, and that only if they purchase a subscription can they discover that this is in fact not true. MPR News, Martin Moylan, “Suit alleges firm soils reputations, then seeks money to improve them,” (May 7, 2020), available at: <https://www.mprnews.org/story/2020/05/07/suit-alleges-firm-soils-reputations-then-seeks-money-to-improve-them>.
7. On or about January 22, 2021, Plaintiff “Googled himself” and discovered his name listed at www.mylife.com.
8. He followed up by clicking on the publicly available link and discovered to his horror that the website unequivocally states the following concerning him, which is false: “Criminal or Civil Court records found on Mark’s Background Report.” A follow-up of this on January 25, 2021 confirmed the same. See **Exhibit A** attached hereto.

9. Detailed information beyond this label could only be obtained by purchasing a subscription.
10. The subscription page invites the viewer to “Get instant information on Mark Now!” and states further that there are one or more “Incarceration and Public Records.” See **Exhibit B** attached hereto.
11. Once one subscribes, the news is revealed as follows: “Good news! After scanning the web and government sources we did not find any negative information about Mark Holbrow. The Background Report you pulled has no derogatory entries.” Specifically concerning “Criminal and Court Records,” the website stated that no arrest or criminal records were found.” See **Exhibit C** attached hereto.
12. The detailed report further provides Plaintiff’s home address, his age, his home telephone number, his race, his registered political affiliation and his religious affiliation, the last two of which are incorrect. It also includes his associates, his reported annual income and his net worth. The report further confirms that the Defendant’s “reputation profile” indicates “no criminal or civil court records, lawsuits, liens or negative reviews,” contrary to what it stated in its publicly available teaser. See **Exhibit D** attached hereto.
13. Defendant therefore knew or should have known based on its own information that its public statement, “Criminal or Civil Court records found on Mark’s Background Report,” was false.

COUNT I
DEFAMATION and DEFAMATION PER SE

14. Plaintiffs incorporate the foregoing paragraphs as if more fully set forth at length.
15. In Pennsylvania, a Plaintiff has the burden of proving: (1) the defamatory character of the communication, (2) its publication by the Defendant, (3) its application to the Defendant, (4)

the understanding by the recipient of its defamatory meaning, (5) the understanding by the recipient of its as intended to be applied to the plaintiff, (6) special harm resulting to the plaintiff from its publication, and (7) any abuse of a conditionally privileged occasion if relevant. See 42 Pa.C.S. §8343.

16. Defamation is defined as a communication which tends to harm an individual's reputation so as to lower him or her in the estimation of the community or deter third persons from associating or dealing with him or her. Meyers v. Certified Guar. Co., LLC, 2019 Pa. Super 316, 221 A.3d 662, 669 (Pa. Super. 2019).
17. Defamation "per se" is a special category of defamation that includes: (a) false statements imputing criminal behavior to the plaintiff; (b) false allegations that the plaintiff has a loathsome disease; (c) false statements adversely reflecting on the plaintiff's fitness to conduct business; (d) and false allegations of sexual misconduct. See Restatement (Second) of Torts, §570, and Brinich v. Jencka, 757 A.2d. 388, 397 (Pa. Super 2000).
18. Actual damages in defamation litigation consists of "general" damages and "special" damages. "General damages" are those which typically flow from defamation and include injury to reputation, impairment of standing in the community, personal humiliation and mental anguish. "Special damages" refer to economic harm or pecuniary losses caused by the defamatory communication. Lilac Meadows, Inc. v. Rivello, 2012 Pa. Dist. & Cnty, Dec. LEXIS 147, 21. A cause of action for defamation per se does not require a demonstration of special damages. Id. and Curran v. Philadelphia Newspapers, Inc., 546 A.2d 639, 641, n. 3 (Pa. Super. 1988), and Krolczyk v. Goddard Sys., 2017 Pa. Super. 159 (Pa. Super. 2017).
19. Here, Defendant has publicly stated to anyone who cares to enter his name that Plaintiff has a criminal record on file, when in fact this is untrue, and Defendant knew or should have

known it was untrue because once one pays for the full report, Defendant's own records confirm the lack of criminal records.

20. Defendant therefore published false statements imputing criminal behavior to the plaintiff, which is a species of defamation per se.
21. No special damages need be pled or proven.
22. As a direct and proximate result, of this defamation, which lists Plaintiff by name and would be understood to refer to him by any reasonable reader, Plaintiff suffered typical general damages, such as injury to reputation, impairment of standing in the community, personal humiliation and mental anguish.

WHEREFORE Plaintiff demands judgment against Defendant, both compensatory and punitive, in an amount in excess of \$50,000.

COUNT II
Invasion of Privacy

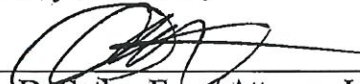
23. Plaintiff incorporates the foregoing paragraphs as if more fully set forth at length.
24. "It is well established in Pennsylvania that a violation of the right of privacy is an actionable tort." Harris by Harris v. Easton Pub. Co., 335 Pa. Super. 141, 483 A.2d 1377, 1383 (Pa. Super. 1984).
25. "Under Pennsylvania law, invasion of privacy involves four separate torts: (1) unreasonable intrusion upon the seclusion of another; (2) appropriation of another's name or likeness for commercial purposes; (3) publicity given to another's private life; and (4) publicity that unreasonably places another in a false light before the public." Tagouma v. Investigative Consultant Svcs., 4 A.3d 170, 174 (Pa. Super. 2010).
26. Here, Defendant has publicly and unreasonably placed Plaintiff in a false light before the public by claiming that he has a criminal history when he does not, and when Defendant's

own records confirm this.

27. Further, the report at Exhibit D, which provides detailed information about Plaintiff, easily purchasable by the public, wrongly claims that he is a registered Republican (he is in fact a registered Democrat), that his religious affiliation is Christian (which is also not accurate), wrongly inflates his actual net worth, and wrongly associates him with people he doesn't know.
28. There is no requirement under this tort to demonstrate financial loss, because, as the Supreme Court has stated, "Damages in actions of defamation are for an injury to reputation, while damages in action for invasion of privacy are for injury to one's own feelings." Hull v. Curtis Publ'g Co., 182 Pa. Super. 86, 99 n.5, 125 A.2d 644, 650 (1956). See also Burger v. Blair Med. Assocs., 600 Pa. 194, 202, 964 A.2d 374, 378 (2009) and Aquino v. Bulletin Co., 190 Pa. Super. 528, 533-34, 154 A.2d 422, 426 (1959) ("The fact that the plaintiff suffered neither pecuniary loss nor physical harm is unimportant. The damages whether nominal, compensatory or punitive can be awarded in the same way in which general damages are given for defamation.").
29. As a direct and proximate result, of this invasion of privacy, Plaintiff suffered typical general damages, such as injury to reputation, impairment of standing in the community, personal humiliation and mental anguish.

WHEREFORE Plaintiff demands judgment against Defendant, both compensatory and punitive, in an amount in excess of \$50,000.

Respectfully Submitted,


 Andrew D. Cotlar, Esq. / Attorney I.D. #204630
 Law Office of Cotlar & Cotlar

Attorneys for Plaintiff
23 West Court Street
Doylestown, PA 18901
(215) 345-7310

VERIFICATION

I, Mark Holbrow, verify that the statements made in the foregoing document are true and correct to the best of my knowledge, information and belief. I understand that false statements therein are subject to the penalties set forth in 18 Pa. C.S. Section 4904 relating to unsworn falsification to authorities.

A handwritten signature in cursive script, appearing to read "Mark Holbrow", is written over a horizontal line.

Mark Holbrow

Exhibit A

Summary: Mark Holbrow is 68 years

Exhibit B

MyLife.com - Background Check

https://www.mylife.com/site/bg-check-purchase.view?adl=1149640552&epid=e376552413660&page=section

Lexis Advance Home

Other Bookmarks

Select Your Plan and Lock In Your Rate

See our best deal and most popular plans below

Plan	Price	Savings
<input checked="" type="radio"/> 12 months	\$9.95 per month	Save 38%* \$72.00 savings
<input type="radio"/> 6 months	\$10.95 per month	Save 31%* \$30.00 savings
<input type="radio"/> 3 months	\$15.95 per month	
<input type="radio"/> 3 day trial (Limited Time Offer)	\$1.00**	

Mark Holbrow
Age: 68 Years Old
Location: New Hope, PA
Latest report as of 01/25/2021

Results may also include:

Incarceration and Public Records	Liens and Judgments	Deeds and Encumbrances
1 OR MORE RECORDS	CURRENT RECORDS	CURRENT RECORDS

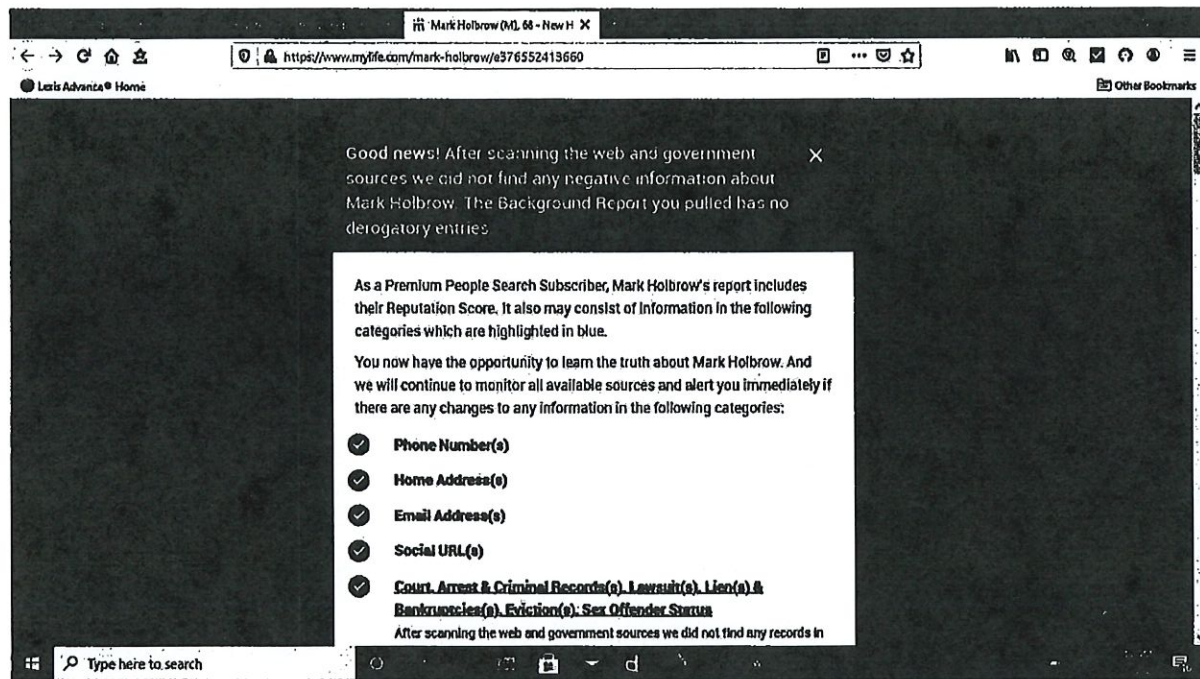
Your Report Information Includes:

Phone Numbers	Addresses	Email Address
1 FOUND	2 FOUND	1 FOUND

Our Guarantee
If you are dissatisfied with our product, please contact our Customer Service Team. We will do our best to resolve your concerns.

Type here to search

Exhibit C



Case# 2021-00634-0 - JUDGE:50 Received at County of Bucks Prothonotary on 02/03/2021 3:58 PM, Fee = \$258.50. The filer certifies that this filing complies with the provisions of the Public Access Policy of the Unified Judicial System of Pennsylvania: Case Records of the Appellate and Trial Courts that require filing confidential information and documents differently than non-confidential information and documents.

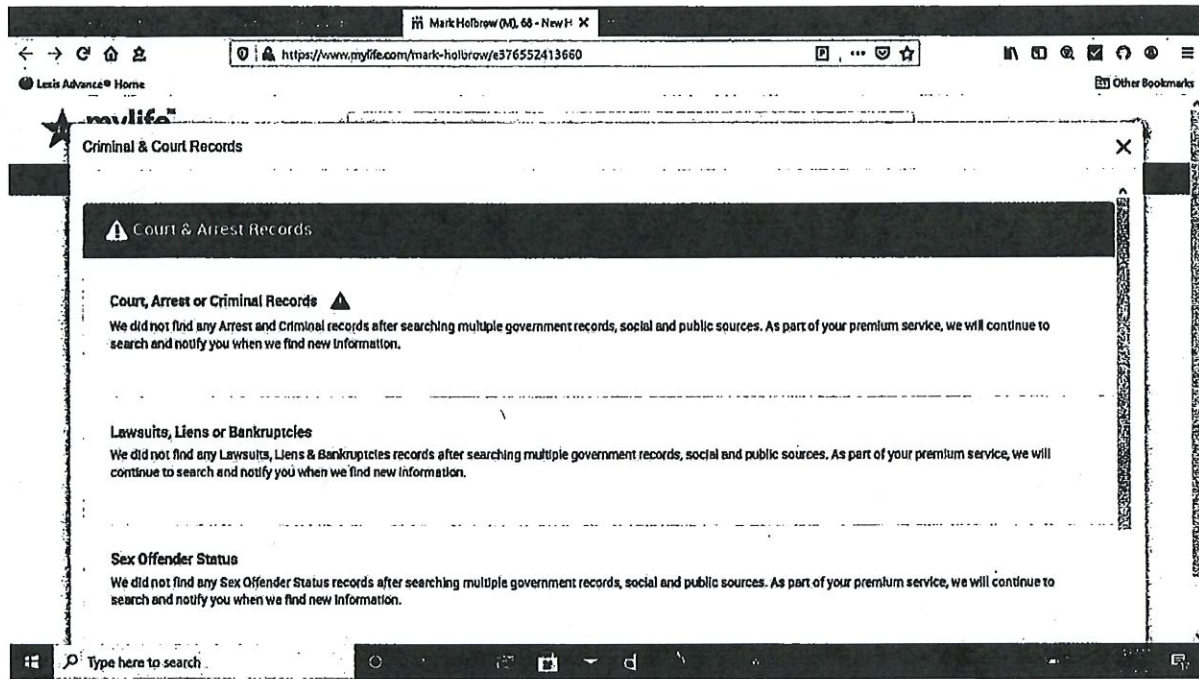


Exhibit D

Mark Holbrow (M), 68 - New Hope, PA Has Court or Arrest Recor...

<https://www.mylife.com/mark-holbrow/e376552413660>

My
Dashboard

(<https://www.mylife.com/site/dashboard.view>)

Reputation

Profile

(<https://www.mylife.com>)

People

I Follow

(<https://www.mylife.com/site/connections.view>)

Where's

My Info

(<https://www.mylife.com/site/prv.view?page=privacy>)



Court Records found

[View](#)

Mark Holbrow

([/site/ob/init/ps-bgc.view?epid=e376552413660&](/site/ob/init/ps-bgc.view?epid=e376552413660&pagesection=vcard-name)

pagesection=vcard-name)

3008 River Rd,
New Hope, PA 18938

Age: 68

AKA: mark M Holbrow

9 Profile Searches

Previous Addresses: New Hope, PA

Phone: (215)-862-6111



Reputation Score

3.30 /5

RATE MARK

(0) Reviews



Mark's Reputation Score is

(10%) Below the National Average!

Summary

Follow

Summary: Mark Holbrow is 68 years old and was born on 06/06/1952. Mark's current home is located at New Hope, PA. Mark also answers to Mark M Holbrow, and perhaps a couple of other names. Mark's ethnicity is Caucasian, whose political affiliation is currently a registered Republican; and religious views are listed as Christian. Mark is now married. Mark maintains relationships with many people -- family, friends, associates, & neighbors -- including Doris Holbrow (/doris-holbrow/e364845068286), Lisa Martini (/lisa-martini/e392010081468), Arthur Holbrow

(/arthur-holbrow/e376399127118), Elizabeth Brunazzi (/elizabeth-brunazzi/e80313126420) and Suzanne Stephens (/suzanne-stephens/e795015933756). Mark's reported annual income is about \$175 - 199,999; with a net worth that tops Greater than \$499,999.

School: Add Info

(/site/ob/init/ps-bgc.view?epid=e376552413660)

Associates: doris B Holbrow (/Doris-holbrow/e364845068286), Lisa M Martini (/Lisa-martini/e392010081468), Arthur T Holbrow (/Arthur-holbrow/e376399127118)

Work: Add Info

(/site/ob/init/ps-bgc.view?epid=e376552413660&pagesection=work)



Write
Review



Edit
Profile



Lock
Info



Write
Message

9 People Viewed or Searched for this profile



Andrew Cotlar, 52 (/Site/user-profile.view?uid=930570739)
Doylestown, PA



Anonymous,
Doylestown, PA



Anonymous,
Lambertville, NJ



Anonymous,
Lambertville, NJ



Anonymous,
Doylestown, PA



Anonymous,



Your search for Mark was successful & we're happy to say they have no Court and Arrest Records.

We did an exhaustive scan of the Internet searching government, public websites, & other sources to provide a complete picture of Mark's background & reputation details. They have no criminal or civil court records, lawsuits, liens, or negative reviews on their Reputation Profile.

We'll continue to monitor their Reputation Profile & Reputation Score & send you an alert when there are changes so you're not caught by surprise. Learning the truth about people by seeing their Reputation Profile can help keep you and your family safe.

Search anyone's Reputation Profile

Current Address

3008 RIVER RD,
NEW HOPE, PA 18938-5700

(<https://address.mylife.com/address-3008+river+rd/new-hope/pa/18938>)

Year Built: 1918

Bedrooms: 4

Baths: 1.00

Property Lot Size: 7449 SF

Building Area: 1680

Owner: holbrow, mark

Owner2: martini, lisa

Tax Year: 2019

Tax Amount: \$3,915.15

Total Market Value: \$242,202

Sale Price: \$417,000

Owner: holbrow, mark

Owner2: martini, lisa

Home Value: \$417

Purchase Price: \$417

Past Address

7022 Ely Rd,

New Hope, PA 18938

<https://address.mylife.com/address-7022+ely+rd/new-hope/pa/18938>**Past Addr**

6 W Bridge

New Hope,

<https://add>**Current Phone Number**

(215)-862-6111

<https://phone.mylife.com/phone-215-862-6111>**Phone Information****Listed Name:** MARK HOLBROW**First:** MARK

EXPAND ▼

Email Address

mholbrow@bcac.com

Email Adc

aholbrow@

Personal Details**Date of Birth:** 6/6/1952**Politics:** Republican**Ethnicity:** Caucasian**Religion:** Christian**Income:** \$175 - \$199,999**Net Worth:** Greater than \$499,999**Relationship:** Married**Kids:** Add Info[Edit this Information](#)**Education**[+ Add](#)

We did not find any records after searching multiple government records, social and public sources. As part of your premium service, we will continue to search and notify you when we find new information.

Education

Keeping thi

Work[+ Add](#)

We did not find any records after searching multiple government records, social and public sources. As part of your premium service, we will continue to search and notify you when we find new information.

Work

Keeping thi

Automobiles[+ Add](#)

Year: Add Info

Make: Add Info

Model: Add Info

[Edit this Information](#)

House Plan

Year Built: 1918

Bedrooms: 4

Baths: 1.00

Property Lot Size: 7449 SF

Building Area: 1680

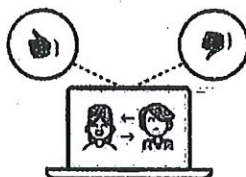
Properties**Home Value:** \$417**Purchase Price:** \$417[Edit this Information](#)**3 Relatives/Associates****Doris Holbrow, 94** (/Doris-holbrow/e364845068286)
New Hope, PA**Lisa Martini, 56** (/Lisa-martini/e392010081468)
New Hope, PA**Arthur Holbrow, 102** (/Arthur-holbrow/e376399127118)
New Hope, PA**10 Neigh****Eliz**
Ne**Su:**
Ne**Ma**
Ne**Rol**
Ne**Sal**
Ne

Personal Review

Boost Mark's Reputation Score by providing a personal review.

Professor

Boost Mark'



Write Review

Other Mark Holbrow's**Mark Holbrow, 62**

Framingham, MA

(/Mark-holbrow/e376552503180)

Find Anyone:

A (<https://www.mylife.com/people-search/a/>) | B (<https://www.mylife.com/people-search/b/>) |
 C (<https://www.mylife.com/people-search/c/>) | D (<https://www.mylife.com/people-search/d/>) |
 E (<https://www.mylife.com/people-search/e/>) | F (<https://www.mylife.com/people-search/f/>) |
 G (<https://www.mylife.com/people-search/g/>) |
 H (<https://www.mylife.com/people-search/h/>) | I (<https://www.mylife.com/people-search/i/>) |
 J (<https://www.mylife.com/people-search/j/>) | K (<https://www.mylife.com/people-search/k/>) |
 L (<https://www.mylife.com/people-search/l/>) |

M (<https://www.mylife.com/people-search/m/>) |N (<https://www.mylife.com/people-search/n/>) |O (<https://www.mylife.com/people-search/o/>) | P (<https://www.mylife.com/people-search/p/>) |Q (<https://www.mylife.com/people-search/q/>) | R (<https://www.mylife.com/people-search/r/>) |S (<https://www.mylife.com/people-search/s/>) | T (<https://www.mylife.com/people-search/t/>) |U (<https://www.mylife.com/people-search/u/>) | V (<https://www.mylife.com/people-search/v/>) |W (<https://www.mylife.com/people-search/w/>) |X (<https://www.mylife.com/people-search/x/>) | Y (<https://www.mylife.com/people-search/y/>) |Z (<https://www.mylife.com/people-search/z/>)People Search (<https://www.mylife.com/people-search/>) | Contact Us (<https://www.mylife.com/contact-us>)User Agreement (<https://www.mylife.com/user-agreement>) | Privacy Policy (</privacy-policy>)

Copyright ©2021 MyLife.com®, Inc.

Do Not Sell My Info (</privacy-policy#caliResidentsNotice>)

EXHIBIT B

KLEHR HARRISON

HARVEY BRANZBURG LLP

Jordan M. Rand (Pa. I.D. 208671)

1835 Market Street, Suite 1400

Philadelphia, PA 19103

(215) 569-3024

jrand@klehr.com

Attorneys for Defendant

<hr/>		:	COURT OF COMMON PLEAS
MARK HOLBROW,		:	BUCKS COUNTY
	Plaintiff,	:	
	v.	:	
		:	
MYLIFE.COM, INC.,		:	NO: 2021-00634
	Defendant.	:	
<hr/>		:	

CERTIFICATE OF SERVICE

I, Jordan Rand, Esquire, do hereby certify that a true and correct copy of Defendant's Notice of Removal was filed with the Court on the date set forth below and served upon counsel via US Regular Mail and/or electronic mail, as follows:

Andrew Cotlar, Esquire
COTLAR & COTLAR
23 West Court Street
Doylestown, PA 18901
Attorney for Plaintiff

**KLEHR HARRISON HARVEY
BRANZBURG LLP**

Date: February 23, 2021

/s/ Jordan Rand

Jordan M. Rand (208671)
1835 Market Street, Suite 1400
Philadelphia, PA 19103
(215) 569-3024
jrand@klehr.com